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ENTERPRISES, LLC

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

ROGER SAULN, an individual,

Plaintiff,

vs.

PODS ENTERPRISES, LLC, a Foreign Limited  
Liability Company,

Defendant.

Case Number  
2:22-cv-00497-JCM-DJA

**STIPULATION AND ORDER TO  
EXTEND SCHEDULING ORDER  
DEADLINES  
(First Request)**

IT IS HEREBY STIPULATED AND AGREED, by and between the parties' counsel of record, that discovery deadlines in the Discovery Plan and Scheduling Order (ECF No. 16) be extended an additional sixty days (60) days. The parties request additional time to permit the parties sufficient time to adequately complete discovery and explore possible resolution of the claims.

The parties request the following deadlines be modified:

Description of Discovery Deadline	Current Discovery Deadline	Proposed Discovery Deadline
Discovery Cut Off	October 11, 2022	December 12, 2022 <sup>1</sup>
Dispositive Motion(s)	November 10, 2022	January 9, 2023
Joint Pretrial Order <sup>2</sup>	December 10, 2022	February 8, 2023

The parties provide the following information to the Court regarding the proposed extension of the discovery deadline.

**Discovery Completed To Date**

The parties have exchanged their initial disclosures, and are working to complete initial written discovery.

**Remaining Discovery To Be Completed**

Defendant intends to conduct Plaintiff's deposition. Depositions may also be conducted of any current or former employees identified by Plaintiff, as well as additional and related written discovery.

**Reasons Discovery Could Not Be Completed Within The Existing Deadline**

The parties continue to make progress in this matter while exploring possible resolution. The parties intend to coordinate depositions, written discovery, and document production to fully evaluate the claims and defenses presented. This extension will allow the parties to conduct depositions prior to the close of the discovery period.

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<sup>1</sup> The sixtieth day after October 11, 2022 is Saturday, December 10, 2022.

<sup>2</sup> If dispositive motions are filed, the Joint Pretrial Order will be due thirty (30) days after the Court enters its decision on any dispositive motion(s).

1 This is the parties' first request for an extension of the discovery deadline date and is not made  
2 to delay this matter. Based upon the foregoing, the parties believe there is good cause for the  
3 requested extension.

4 DATED this 20<sup>th</sup> day of July, 2022.

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6 PHELPS DUNBAR LLP

HATFIELD & ASSOCIATES, LTD.

7 /s/ Marian L. Massey

/s/ Trevor J. Hatfield

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17 *Attorneys for Defendant*

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18  
19 **ORDER**

20 IT IS SO ORDERED:

21   
UNITED STATES MAGISTRATE JUDGE

22 DATED: July 21, 2022